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17 UNITED STATES DISTRICT COURT  
18 CENTRAL DISTRICT OF CALIFORNIA

19 CHARMAINE CHUA, ET AL.

20 PLAINTIFFS,

21 VS.

22 CITY OF LOS ANGELES, ET AL.,

23 DEFENDANTS.

CASE No: 2:16-cv-00237-JAK-GJS(x)  
[HON. JOHN A. KRONSTADT]

SUPPLEMENTAL SUBMISSION RE:  
ADMINISTRATION OF CLASS CLAIMS

HEARING DATE: SEPTEMBER 9, 2019

HEARING TIME: 8:30 A.M.

COURTROOM: 10B

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1           Plaintiffs hereby provide updated information on the anticipated costs  
2 of administration of the class claims in this matter. As the Court is aware,  
3 Plaintiffs proposed that the class notice and claims be handled by Plaintiffs'  
4 counsel to reduce the costs of administration. The basis for the in-house proposal  
5 was counsels' belief that, given the size of the class and the fact that they already  
6 had access to current information for the majority of the class and could, therefore,  
7 administer the settlement at less cost in house.

8           In the motion for preliminary approval, Plaintiffs' counsel requested \$20,000  
9 for the administration of the class claims. Plaintiffs' counsel now believes that  
10 notice and fulfillment can be accomplished at considerably less cost and requests  
11 that the Court approve the \$20,000 as a cap, rather than a flat cost item.

12           In anticipation of the hearing on Plaintiffs' motion for preliminary approval  
13 of the settlement, the undersigned counsel compiled a database of all class  
14 members, using the redacted booking list from the Defendant. This list of putative  
15 class members arrested at 6<sup>th</sup> and Hope was then cross-referenced with contact lists  
16 maintained by the class representatives, as well as information collected by  
17 Plaintiffs' counsel at the first criminal court appearance for the class members.

18           Using this list, Plaintiffs' counsel recently emailed the putative class  
19 members. Only 7 of 71 emails were returned as undeliverable and three of those  
20 have been updated. Plaintiffs believe that they have current contact information for  
21 82 of the 125 class members. Two of the 127 arrestees brought their own lawsuits,  
22 bringing the total to 125 people in the class. Utilizing date of birth and last known  
23 addresses from the booking reports, current contact information for nearly all of  
24 the remaining 43 class members will be available at a small cost to an outside firm.

25           Plaintiffs now anticipate that the distribution of the notice and relevant  
26 claims materials for the vast majority of putative class members, and potentially  
27 for all but a few, can be accomplished by email and through the website created for  
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1 the class. There will be minimal costs for printing and postage, as well as reduced  
2 labor costs if the notice is done in this manner.

3 Plaintiffs propose that the Court approve the previously requested \$20,000  
4 flat fee as a cap, with \$45 an hour as the compensation rate for support staff time  
5 to administer class claims. The undersigned spent approximately three (3) hours to  
6 date supervising this process and communicating with class members. At present,  
7 Plaintiffs intend to bill only for the time incurred by support staff in administering  
8 and processing claims. To date, Plaintiffs incurred approximately 25 hours to  
9 create the basic website, database, input class member information from various  
10 sources and email putative class members to update on the case and the upcoming  
11 motion for preliminary approval.

12 It now appears that, based on the foregoing, it is unlikely that staff time for  
13 the claims process will exceed 200 hours and may well be less. Out-of-pocket  
14 costs are unlikely to exceed \$1,500, including expenses for the website, postage,  
15 photocopying and printing. No cost is anticipated for publication of the notice  
16 because all class members are already known and Plaintiffs believe current contact  
17 information is available for nearly all. This estimate also assumes that, given the  
18 make-up of the class, most will participate in the claims process digitally.

19  
20 Dated: Sept. 5, 2019      Respectfully submitted,

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22 **KAYE, McLANE, BEDNARSKI & LITT**  
23 **LAW OFFICE OF CAROL SOBEL**  
24 **SCHONBRUN, SEPLOW, HARRIS & HOFFMAN**

25 By:           /s/ Carol A. Sobel            
26 **CAROL A. SOBEL**  
27 **Attorneys for Plaintiffs**  
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